



KELLEY S. OLAH, (SBN 245180)
kelley.olah@btlaw.com
BARNES & THORNBURG LLP
 2029 Century Park East, Suite 300
 Los Angeles, California 90067
 Telephone: (310) 284-3880
 Facsimile: (310) 284-3894

Attorney for Defendant
 CAPITAL RESIN CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

ATS PRODUCTS, INC.,

Plaintiff,

vs.

CHAMPION FIBERGLASS, INC.;
 FRANK GHIORSO; TG SOLUTIONS-
 GLOBAL, LLC; CAPITAL RESIN
 CORPORATION; LOUIS PILATO.

Defendants.

Case No. 3:13-cv-02403-SI

**STIPULATION TO EXTEND TIME TO
 RESPOND TO COMPLAINT (L.R. 6-1)**

Fourth Amended Complaint Served: July 16,
 2015

Current Response Date: August 20, 2015

Agreed Response Date: September 3, 2015

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Pursuant to Civil Local Rules 6-1(a), Defendant Capital Resin Corporation (hereinafter “Defendant”), and Plaintiff ATS Products, Inc. (hereinafter “Plaintiff”) hereby stipulate to Defendant’s request, for an extension of time for Defendant to file a response to Plaintiff’s Fourth Amended Complaint.

WHEREAS, Plaintiff’s Fourth Amended Complaint (the “FAC”) was filed on July 6, 2015. Defendant was served on or about July 16, 2015,

WHEREAS, the last day for Defendant to respond to the FAC is August 20, 2015, by prior extension,

1 WHEREAS, Defendant and Plaintiff agree to extend the time for Defendant to respond to
2 the FAC.

3 IT IS HEREBY STIPULATED by and between Defendant and Plaintiff, by and through
4 their respective counsel, that Defendant Capital Resin Corporation will have until and including
5 September 3, 2015 to file and serve their response to the FAC.

6
7
8 Dated: August 20, 2015

SHEA & McINTYRE, A.P.C.

9 By /s/ Marc Shea
10 Marc Shea
Kevin Elliot
Attorney for Plaintiff ATS PRODUCTS, INC.

11
12 Dated: August 20 , 2015

BARNES & THORNBURG LLP

13 By /s/ Kelley S. Olah
14 Kelley S. Olah
15 Attorney for Defendant
16 CAPITAL RESIN CORPRATION

17
18 **Attestation Pursuant to Civil Local Rule 5.1(i)**

19 Pursuant to Civil Local Rule 5.1(i), I, Stacy L. Foster, hereby attest that I have obtained
20 concurrence in the filing of this document from the other signatories to this document.

21 I declare under penalty of perjury under the law of the United States of America that the
22 foregoing is true and correct. Executed on August 20, 2015 at Los Angeles, California.

23
24 /s/ Kelley S. Olah
Kelley S. Olah